

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

JOHN AND JANE DOE NO. 1,	:	CASE NO. 3:22-cv-00337
et al.,	:	
	:	
Plaintiffs,	:	JUDGE MICHAEL J. NEWMAN
	:	
vs.	:	
	:	
BETHEL LOCAL SCHOOL	:	
DISTRICT BOARD OF	:	
EDUCATION, et al.,	:	
	:	
Defendants.	:	

DECLARATION OF BRONWYN CROLEY

I, Bronwyn Croley, declare:

1. My name is Bronwyn Croley. I am over the age of 21 and fully competent to make this declaration.
2. I have personal knowledge of all of the facts stated in this declaration, and my statements in this declaration are true and accurate to the best of my knowledge, information, and belief.
3. I am the mother of a Bethel Local Schools student.
4. On February 2, 2022, I received an email from Mr. Justin Firks, who was the Bethel Local Schools Superintendent at the time ("Firks Email").
5. Exhibit A is a true and accurate copy of the Firks Email.

I declare under penalty of perjury that the foregoing is true and correct.

1-22-23  
Date

Bronwyn Croley  
Bronwyn Croley

# EXHIBIT A

**From:** [Justin Firks](#)  
**To:** [Bronwyn Croley](#)  
**Subject:** Re: BOE Planning Meeting  
**Date:** Wednesday, February 2, 2022 9:43:11 AM

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Ms. Croley:

Thank you for your email and the words that you have shared. I know Mr. McBride very well. I worked with him when I was the Principal at Fort Loramie Local Schools up in Shelby County.

Having grown up in Mercer County (Coldwater) and knowing that 81% of **MERCER COUNTY** voted Republican in the last Presidential election and also being a **DEVOUT and PRACTICING** Catholic each day of my life, I understand my personal values, where I stand on issues and how I have voted in each election since I have been 18.

I also know that I must separate my personal feelings from my professional duties as an administrator and enforce the decisions made by any and all school boards in the district in which I serve and have served previously (Fort Recovery and Fort Loramie). Both of those districts are similar to Newton in demographics.

If Bethel Local Schools, the district, and its parents want to change their stance; let the BOE know. Ultimately these decisions are made by them and we (administrators) are responsible for the day-to-day operations of running and managing the school buildings and the district.

With Bethel Pride,  
Justin M. Firks

Bethel Local Schools

Superintendent

On Wed, Feb 2, 2022 at 7:59 AM Bronwyn Croley <[bronwyn\\_croley@hotmail.com](mailto:bronwyn_croley@hotmail.com)> wrote:  
Mr. Firks,

I attended the BOE Planning Meeting last night. I am truly disappointed in the leadership across the board at Bethel Local Schools.

While the discussion around the restroom policy was laughably left leaning, it was the few minutes before it that had me leaving permanent teeth impressions in my tongue.

Let me try to understand this. The biological female security guard (who is an armed *adult*!) would not be comfortable going into the men's room for disciplinary purposes (for which she has been hired) but my 12 year old daughter should be totally fine with a mixed gender situation when she needs to

actually use said facilities?? The hypocrisy is beyond my comprehension!

Listen to your own words attached!

You KNOW the restrooms are not being closely monitored enough to stop students from vaping? But you think you have a handle on potential sexual assaults?!? In your own words, "good luck!"

We are not backing down. Your board needs to vote on this issue (procedure/stance/policy) so the community clearly sees (and has on record) the names of those not standing up for ALL 1700 of our children.

We are not Troy. We are not Tipp. We are Bethel, and our policies (procedures, stances, whatever you want to call them!) should reflect who WE are! If you want to model us after anyone though, perhaps try Newton. The words of their conservative superintendent, Pat McBride, are below:

"Biological boys will use the boys restroom. Biological girls will use the girls restroom. Period. We would allow a boy or girl to use the "family" bathroom while alone if requested. We will not allow a boy to use the girls restroom as long as I am Superintendent. My community will overwhelmingly support me on this issue even if it brings legal action. We have seen what has happened in Loudon County and Fairfax County Virginia. It is not going to happen here. I make this commitment as a Christian and as a father who would not accept a school allowing a biological boy into the girls restroom while my daughter was in that restroom."

"Let not any one pacify his conscience by the delusion that he can do no harm if he takes no part, and forms no opinion. Bad men need nothing more to compass their ends, than that good men should look on and do nothing. He is not a good man who, without a protest, allows wrong to be committed in his name, and with the means which he helps to supply, because he will not trouble himself to use his mind on the subject."

-John Stuart Mill

See you on the 14th!

Bronwyn Croley